

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

-v.-

JOSHUA MAST, *et al.*,

Defendants,

and

UNITED SECRETARY OF STATE  
ANTONY BLINKEN, *et al.*

Nominal Defendants.

CIVIL NO: 3:22-cv-00049-NKM-JCH

**DEFENDANT RICHARD MAST'S MOTION TO SEAL HIS SUPPLEMENTAL MOTION  
TO COMPEL AND EXHIBITS 1 AND 5 TO THE MOTION AND MEMORANDUM OF  
LAW IN SUPPORT OF MOTION TO SEAL**

Defendant Richard Mast hereby moves for an order to seal his supplemental motion to compel (Dkt. No. 289) and Exhibits 1 (Dkt. No. 289-1) and 5 (Dkt. No. 289-5) to that motion, pursuant to Local Civil Rule 9, this Court's Protective Order (ECF No. 26), and instructions by the Court's deputy clerk. The three documents were filed and inadvertently included actual names of Plaintiffs. The undersigned immediately contacted the parties to inform them of the mistake and also contacted the deputy clerk to place the unredacted documents under seal, and thus this motion follows.

In support of this motion to seal, Defendant Richard Mast states as follows: This Court has issued a Protective Order (ECF No. 26) allowing Plaintiffs to proceed under pseudonyms and requiring the parties to use pseudonyms. The three documents should have been redacted, but mistakenly they were not. The deputy clerk immediately placed the three documents under seal when contacted by the undersigned along with instructions to file this motion. Accordingly,

Defendant Mast requests that the Court order the sealing of the supplemental motion to compel (Dkt. No. 289) and Exhibits 1 (Dkt. No. 289-1) and 5 (Dkt. No. 289-5) of the motion.

A proposed Order is attached as Exhibit A to this Motion.

Dated: September 15, 2023

Respectfully submitted,

*/s/*David Yerushalmi  
David Yerushalmi, Esq.\*  
American Freedom Law Center  
2020 Pennsylvania Avenue NW, Suite 189  
Washington, D.C. 20006  
(\*Admitted *pro hac vice*)

E. Scott Lloyd  
Lloyd Law Group, PLLC  
Va. Bar # 76989  
20 E. 8th Street, Suite 3  
Front Royal, VA 22630  
Office: (540) 823-1110  
Cell: (540) 631-4081  
Fax: (540) 583-4279  
[scott@lloydrg.com](mailto:scott@lloydrg.com)

*Counsel for Defendant Richard Mast*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 15, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically: none.

*/s/*David Yerushalmi  
David Yerushalmi, Esq.